

Exhibit 2

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LAI MING CHUI,

Plaintiff,

Case No. 1:11-cv-119

v.

Hon. Paul L. Maloney
Chief, U.S. District Court Judge

PATRICK R. DONAHOE,
Postmaster General,

Hon. Joseph G. Scoville
United States Magistrate Judge

Defendant.

DECLARATION OF LINDA WOODS

I, LINDA WOODS, make the following declaration in lieu of an affidavit, as permitted by Section 1746 of Title 28 of the United States Code. I am aware that this declaration will be used in connection with the Defendant's Motion for Summary Judgment by Patrick R. Donahoe, Postmaster General of the United States Postal Service (hereinafter "Postal Service") in the above-referenced case.

1. I am employed as a Manager of Post Office Operations ("POOM") in Saginaw, Michigan within the Greater Michigan District of the United States Postal Service. I am presently responsible for managing approximately 135 postmasters. I have been employed with the Postal Service since April 19, 1969 and have held various supervisory and managerial positions since 1976 to the present. Between April 2009 and April 2010, I was assigned a temporary detail assignment as the Acting Plant Manager for the Kalamazoo Processing and Distribution Center ("P & DC"). Based on my postal experience and supervisory/managerial experience, I am familiar with the policies for limited duty and rehabilitation job offer assignments provided to employees within the Postal Service.

2. The Federal Employees' Compensation Act (FECA), 5 U.S.C. 81 is administered by the Office of Workers Compensation Programs (OWCP), United States Department of Labor. OWCP determines whether an employee is entitled to benefits under FECA, such as approving or accepting a claim as being work-related.

3. Limited duty assignments are provided to employees who suffered a work-related injury during the recovery process when the effects of the injury are considered temporary. A rehabilitation assignment is provided to employees who have suffered a work-related injury when the effects of the injury are considered permanent and/or the employee has reached maximum medical improvement.

4. The Postal Service does not have any funded positions that are reserved for employees on limited duty or rehabilitation assignments who cannot perform the core requirements of their official position due to medical restrictions. Postal Service employees' official positions are their position titles as listed on the Notice of Personnel Action, PS Form 50.

5. A review of Lai Ming Chui's Notices of Personnel Action, PS Form 50, reveals that her official position was that of a Mail Processing Clerk since November 3, 2001. *See* Chui's Notices of Personnel Action, PS Form 50, dated November 3, 2001; August 8, 2008 and November 21, 2009, true and correct copies of which is attached hereto as Exhibit 2-A ("Exhibit 2-A"), at ¶ 52.

6. While I was the Acting Plant Manager at the Kalamazoo P & DC, Ms. Chui's grade level as a Mail Processing Clerk was a PS-7, which is a bargaining unit employee grade level. *See* Exhibit 2-A, pp. 2-3 at ¶ 61.

7. When I arrived at the Kalamazoo P & DC, Ms. Chui was working in the supervisor's office performing duties listed on a rehabilitation job offer assignment dated

February 2004 and July 2007. Those duties listed on her rehabilitation job offer assignments consisted of: filing Request for or Notification of Absences, PS Form 3971; recording or preparing bargaining unit employees' schedules; preparing overtime desired lists for bargaining unit employees; typing, retrieving and passing out copies of safety service talks to supervisors; collecting dock surveys; typing; special projects for supervisors and conducting postmark checks. I do not recall seeing Ms. Chui collecting dock surveys or conducting postmark checks. See Chui's USPS Rehabilitation Job Offer Assignments dated February 21, 2004 and July 7, 2007, true and correct copies of which are attached hereto as Exhibit 2-B ("Exhibit 2-B").

8. The duties listed on Ms. Chui's rehabilitation job offer assignments do not consist of a funded position at the Kalamazoo P & DC. Rather, all the duties listed, except for collecting of dock surveys and conducting postmark checks, are duties of the Supervisors of Distribution Operations or Managers of Distribution Operations. For example, in addition to the supervisory and managerial duties of supervising and managing employees, supervisors and managers are also required to perform their own administrative duties, such as filing PS Forms 3971; recording and preparing schedules of their employees; processing the union's requests for information regarding their employees; preparing the overtime desired lists of their employees; and typing, copying and passing out safety service talks to the supervisors. Supervisors and managers are also required to perform their own computer related duties such as entering, searching or printing Time and Attendance Collection System ("TACS") reports, which are reports that contain employees' clock rings and attendance. In addition, supervisors and managers should write their own delivery scores on a dry erase board during a managerial meeting. Bargaining unit employees should not be present during supervisor and manager meetings as confidential information related to bargaining unit employees may be discussed.

9. The Kalamazoo P & DC also does not have a funded position for an employee to only collect dock surveys and conduct postmark checks. Rather, those duties are incidental duties of bid positions that are held by other employees.

10. The 2004 and 2007 Rehabilitation Job Offer Assignments issued to Ms. Chui were assignments created specifically for her and do not comprise of funded positions by the Postal Service. Those Rehabilitation Job Offer Assignments were not bid assignments.

11. When an employee, like Ms. Chui, vacates a limited duty or rehabilitation job assignment, for whatever reason, the tasks and duties that comprise those assignments are dispersed back into the workplace, but no residual vacant position that another employee could bid on or otherwise occupy is created—this is so because these assignments are not regularly funded positions on the rolls of the Postal Service. Rather, limited duty and rehabilitation job assignments are created specifically for the employee who suffered an on the job injury.

12. The Kalamazoo P & DC has one secretarial position, which is a non-bargaining Executive and Administrative Schedule (“EAS”) level 12 position. It is a higher level position than Ms. Chui’s bargaining unit PS level 7 position. While I was the Acting Plant Manager at the Kalamazoo P & DC, the secretarial position reported to the Plant Manager and was occupied by Anne Ex. The supervisors and managers did not have a designated funded secretarial position assigned to perform their administrative duties as they were required to perform their own administrative tasks.

13. Based on a review of Ms. Chui’s medical restrictions at the time I was the Acting Plant Manager of the Kalamazoo P & DC, there were no vacant funded positions available for Ms. Chui that she could perform with or without a reasonable accommodation because she was not able to reach, twist, or lift or carry more than 15 pounds frequently and 30 pounds

occasionally for more than two hours per day.

14. There are no vacant funded positions for mail processing clerks to case mail (i.e., sort mail into cubby holes) for only two hours. Mail processing clerks are required to operate and process mail on automation machines. Based on Ms. Chui's medical restrictions, she was not able to perform the essential duties of a mail processing clerk with or without a reasonable accommodation as working on the automation machines requires reaching, twisting and lifting/carrying up to 70 pounds through an entire eight hour day. In addition, casing mail requires reaching and twisting while placing the mail in the various cubby holes.

15. Mailhandlers are required to reach, twist and lift or carry up to 70 pounds during their entire eight hour shift. For example, mailhandlers carry tubs, trays and sacks of mail weighing up to 70 pounds. They are required to reach into containers for the tubs, trays and sacks and lift them onto other equipment. They also must push or pull containers full of mail to various locations in the facility. All of the duties of a mailhandler of reaching and lifting/carrying require the mailhandlers to twist. Facing mail and repairing torn mail are incidental duties of a mailhandler position and are not the main functions of a mailhandler. Based on Ms. Chui's medical restrictions, she cannot perform the essential duties of a mailhandler with or without a reasonable accommodation.

16. Carriers are required to case or hand sort mail into cubby holes in address order in the morning for approximately two to three hours. After they case their mail, they bundle mail, put the mail in tubs and trays and load the tubs and trays of mail into their Postal vehicle for street delivery. A carrier is required to carry a satchel of mail weighing up to 35 pounds while delivering it on the street for approximately five to six hours. Casing mail, loading the vehicle and delivering mail all require reaching and twisting. In addition, a carrier is required to deliver

packages up to the Postal Service's mailing weight of 70 pounds. Based on Ms. Chui's medical restrictions, she cannot perform the essential duties of a carrier with or without a reasonable accommodation.

17. Window Clerks sell Postal products and accept mail and packages from customers. In addition, window clerks perform distribution duties, such as casing/sorting mail for carriers. While casing mail, window clerks reach and twist. While working at the counter, window clerks are required to reach over the counter for packages and mail from customers, lift/carry packages weighing up to the Postal Service's mailing weight of 70 pounds and twist at the counter to place the mail/package from the customer in the appropriate bins and operate the Postal computer (i.e., cash register). Window clerks perform these duties that require reaching, twisting and lifting/carrying for an entire eight hour shift. Based on Ms. Chui's medical restrictions, she cannot perform the essential duties of a window clerk with or without a reasonable accommodation.

18. Custodians clean Postal facilities. They are required to mop and/or sweep the floors, empty garbage cans, clean commons areas such as restrooms, cafeterias and the workroom floors. Custodians are required to reach while mopping or sweeping, twist while performing all of their duties and lift/carry garbage bags. Custodians perform those duties of reaching, twisting and lifting/carrying for their entire eight hour shift. Based on Ms. Chui's medical restrictions, she could not perform the essential duties of a custodian with or without a reasonable accommodation.

19. Ms. Chui never informed me that she wanted to work as a mailhandler, carrier, window clerk or custodian.

20. For the past several years, the Postal Service has suffered great financial losses due to an unprecedented decline in mail volume, which is attributable to ongoing electronic diversion of mail and the current widespread economic recession. In the face of these economic challenges, the Postal Service has been forced to continue its organization-wide cost reduction initiatives that center on matching work hours to reduced mail volume. The Kalamazoo P & DC faced these same challenges.

21. As a result of those financial challenges, I instructed the supervisors and managers at the Kalamazoo P & DC to place all employees who were not performing necessary and productive work on standby time, which is also known as operations number "340." In addition, employees who were on limited duty or rehabilitation job offer assignments were also assessed to determine whether they were performing necessary and productive work. If it was determined that they were performing work that was part of another person's job assignment or bid, or was performing made up or created work, that limited duty or rehabilitation assignment employee was to be placed on standby time.

22. Due to the financial crisis, the Postal Service can no longer create work for employees injured on the job. They are required to perform duties that are necessary and productive to the Postal Service.

23. The duties Ms. Chui performed in her rehabilitation job offer assignments were not necessary and productive as the majority of those duties were duties of a supervisor or manager.

24. Joseph Simmons (Caucasian, national origin unknown) worked with the following medical restrictions related to a work related injury: no lifting, climbing, kneeling, bending/stooping, twisting, pushing/pulling, reaching above the shoulder and operating

machinery; sitting for 8 hours; standing for 1 hour and fine manipulation for 4 hours as tolerated. Based on his medical restrictions, there was no necessary and productive work for Mr. Simmons to perform. As a result, Mr. Simmons was placed on standby for his entire eight hour shift for several months and for a much longer period of time than Ms. Chui. I am not aware of Mr. Simmons engaging in protected activity. I do not know Mr. Simmons' national origin, but he does not appear to be Chinese. See Joseph Simmons U.S. Department of Labor Duty Status Report, Form CA-17, dated December 2007 and August 6, 2010, true and correct copies of which are attached hereto as Exhibit 2-C ("Exhibit 2-C").

25. Patricia Bolen (Caucasian; national origin unknown) worked with the following medical restrictions related to a work related injury: 15 pounds of intermittent lifting; sitting for 8 hours; intermittent standing, walking, kneeling, bending/stooping, twisting, pulling/pushing and reaching above the shoulder; and simple grasping and fine manipulation. Based on Ms. Bolen's medical restrictions, which were not as restrictive as Ms. Chui's and which do not limit her to basically two hours of work like Ms. Chui's restrictions, Ms. Bolen was able to perform some necessary and productive work. However, when necessary and productive work was not available, Ms. Bolen was placed on standby time. Ms. Bolen was not placed on standby time for an entire eight hour shift for several months. I am not aware of Ms. Bolen engaging in protected activity. See Patricia Bolen U.S. Department of Labor Duty Status Report, Form CA-17, dated June 11, 2008, a true and correct copy of which are attached hereto as Exhibit 2-D ("Exhibit 2-D").

26. As of July 2007, Shirley Gurnee (Caucasian; national origin unknown) worked with the following medical restrictions related to a work related injury: lifting ten pounds 2 hours; 8 hours sitting, simple grasping and fine manipulation; 1 hour standing and walking; no

climbing, kneeling, bending/stooping, twisting and reaching above the shoulder. In September 2009, Ms. Gurnee's restrictions were the following: intermittent lifting 10 pounds, 4 hours of intermittent kneeling, climbing, twisting (at the waist) and pulling/pushing; 4 hours of continuous bending/stooping at the waist and reaching above the shoulder; and 6 hours of simple grasping. Based on Ms. Gurnee's medical restrictions, which were not as restrictive as Ms. Chui's and which do not limit her to basically two hours of work like Ms. Chui's restrictions, Ms. Gurnee was able to perform some necessary and productive work. However, when necessary and productive work was not available, Ms. Gurnee was placed on standby time. Ms. Gurnee was not placed on standby time for an entire eight hour shift for several months. I am not aware of Ms. Gurnee engaging in protected activity. See Shirley Gurnee U.S. Department of Labor Duty Status Report, Form CA-17, dated July 27, 2007 and September 21, 2009, a true and correct copy of which are attached hereto as Exhibit 2-E ("Exhibit 2-E").

27. Anthony Riccio (Caucasian; national origin unknown) worked with the following medical restrictions related to a work related injury: no pulling, pushing, reaching above the shoulders, climbing, stooping, kneeling and repeated bending; lifting five pounds; standing and walking 1 hour. Based on Mr. Riccio's medical restrictions, which were not as restrictive as Ms. Chui's and which do not limit him to basically two hours of work like Ms. Chui's restrictions, Mr. Riccio was able to perform some necessary and productive work. However, when necessary and productive work was not available, Mr. Riccio was placed on standby time. Mr. Riccio was not placed on standby time for an entire eight hour shift for several months. I am not aware of Mr. Riccio engaging in protected activity. See Anthony Riccio Medical Restrictions dated March 14, 2008, a true and correct copy of which are attached hereto as Exhibit 2-F ("Exhibit 2-F").

28. Pamela Stenger (Caucasian; national origin unknown) worked with the following medical restrictions related to a work related injury: no lifting more than 10 pounds, no at-or-above shoulder work with the left arm; no away from the body repetitive continuous work; no overhead reaching. Based on Ms. Stenger's medical restrictions, which were not as restrictive as Ms. Chui's and which do not limit her to basically two hours of work like Ms. Chui's restrictions, Ms. Stenger was able to perform some necessary and productive work. However, when necessary and productive work was not available, Ms. Stenger was placed on standby time. Ms. Stenger was not placed on standby time for an entire eight hour shift for several months. I am not aware of Ms. Stenger engaging in protected activity. See Pamela Stenger USPS Rehabilitation Job Offer dated December 2008, a true and correct copy of which is attached hereto as Exhibit 2-G ("Exhibit 2-G").

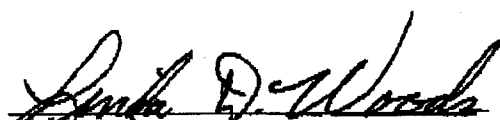
29. Upon my arrival at the Kalamazoo P & DC, Ms. Stenger performed similar duties in her rehabilitation job offer assignment as did Ms. Chui, such as performing supervisory work of filing, computer data entry and processing union requests. She also had other duties listed on her rehabilitation job assignment that were not considered supervisory work, such as contacting mailers for packages and delivering Express mail and other postal delivery duties. I notified Ms. Stenger's supervisor, Leroy Robinson, that Ms. Stenger could no longer perform his supervisory duties, such as his administrative work of filing, computer data entry and processing union requests. While I was at the Kalamazoo P & DC, I was not aware that Dan Verastequi or John Priest still asked Ms. Stenger and Ms. Chui to perform their administrative duties. If I had known that they were performing the supervisor's or manager's administrative duties, I would have stopped it. *Id.*

30. Ms. Stenger filled in for the Plant Manager's secretary, Anne Ex, when Ms. Ex

was on vacation or absent from work. Ms. Ex's position is an EAS level 12 position, which is a higher level assignment than Ms. Stenger's and Ms. Chui's bargaining unit levels. Ms. Stenger filled in for Ms. Ex for one to several days at a time.

31. I am not aware of Mary Portero (Caucasian, national origin unknown) or Sarah Brown (Caucasian, national origin unknown, no known medical condition) engaging in protected activity. Ms. Portero and Ms. Brown do not appear to be Chinese. Due to the decrease in mail volume and lack of necessary and productive work, other employees have been placed on standby who were non-Asian, non-Chinese, did not have any known medical condition and did not engage in protected activities.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.


Linda Woods

Manager, Post Office Operations
Saginaw
Greater Michigan District

9/26/2012
Date



01	Effective Date 11-03-2001	Notification of Personnel Action 	02	Social Security Number 376-90-4174
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EMPLOYEE INFORMATION

U. S. Postal Service

03	Employee Name-Last	CHUI	38	Probation Expir Date	
04	Employee Name-First	LAI	39	FLSA Status	N
05	Employee Name-Middle	MING	40	Pay Location	110
06	Mailing Address-Street/Box/Apts	398 SPRINGBROOK DR	41	Rural Carrier-Route	
07	Mailing Address-City	OTSEGO	42	Rural Carr-L-Rte ID	
08	Mailing Address-State	MI	43	Rural Carr-Pay Type	
09	Mailing Address-Zip	49078-9319	44	Rural Carr-FLSA	
10	Date of Birth	06-10-1964	45	Rural Carr-Commit	
11	Veterans Preference	1	46	Rural Carr-EMA	
12	Sex		47	Rural Carr-Hours	0
13	Ethnicity-Race		48	Rural Carr-Miles	0
14	Disability	05	49	Job Sequence	1
15	Leave Comp Date	09-12-1998	50	Occupation Code	2315-55XX
16	Enter on Duty Date	09-12-1998	51	Position title	MAIL PROCESSOR
17	Retirement Comp Date	09-12-1998	52	Labor Dist Code	1100
18	Serv Anniv Date	20 1998	53	Designation/Activity	11/0
19	TSP Eligibility	Y - ELIGIBLE WITH DEDUCT	54	Position Type	1 - FULL TIME
20	TSP Service Date	09-12-1998	55	Limit Hours	0
21	Prior CSRS Service	N	56	Allowance Code	
22	Frozen CSRS Time		57	Employment Type	

SALARY INFORMATION

23	Leave Data-Category	6 - HOURS/PP	59	Pay Rate Code	A
24	Leave Data-Code	21 2013	60	Rate Schedule Code	
25	Leave Data-Type	1 - ADVANCE AL - EARN SL	61	Grade/Step	06/ E
26	Credit Military Serv		62	Base Salary	34493.00
27	reserved for future use		63	Cola	0.00
28	Retirement Plan	8 - FERS	64	Cola Roll-In Ind	B - PAY SCHEDULE 2
29	Employee Status		65	Next Step PPYR	04 2002
30	Life Insurance	C0 - Basic Only	66	Merit Anniv Date	
31	Special Benefits		67	Merit Lump Sum	0.00

POSITION INFORMATION

32	Employ Office-Fin No	25-4912	68	Special Salary Code	A - SAVED GRADE
33	Employ Office-Title	KALAMAZOO P&DC	69	Protected RSC	
34	Employ Office-Address	MANAGER KALAMAZOO P&DC 3885 S 9TH ST	70	Protected Grade/Step	/
35	Duty Station-Fin No	25-4912	71	Expiration PPYR	
36	Duty Station-Name	KALAMAZOO P&DC	72	Protected RC Hours	
37	Appt Expiration Date		73	Protected RC Miles	
			74	RC Guaranteed Salary	0.00
			75	Annuity Amount	0.00

NATURE OF PERSONNEL ACTION

77	Nature of Action	714	78	Authority	39-USC Sect 1001
79	Description	INVOLUNTARY CHG TO LOWER LEVEL OR BAND			
80	Code		81	Code	
82	Code		83	Code	
84	Remarks				

7991268



85	Authorization	86	Processed Date	11-07-2001
		87	Personnel Office ID	
		88	OFF Location	

PS Form 50, January 2009 (Exception to Standard Form 50)

PMG Documents (L.Chui)
000280



01	Effective Date 08-30-2008	Notification of Personnel Action 		02	Social Security Number 376-90-4174
EMPLOYEE INFORMATION U. S. Postal Service					
03	Employee Name-Last	CHUI	38	Probation Expir Date	
04	Employee Name-First	LAI	39	FLSA Status	N
05	Employee Name-Middle	MING	40	Pay Location	312
06	Mailing Address Street/Box/Apt	398 SPRINGBROOK DR	41	Rural Carrier-Route	
07	Mailing Address-City	OTSEGO	42	Rural Carr-L-Rte ID	
08	Mailing Address-State	MI	43	Rural Carr-Pay Type	
09	Mailing Address-Zip	49078-9319	45	Rural Carr-FLSA	
10	Date of Birth	06-10-1964	46	Rural Carr-Commit	
11	Veterans Preference	1	47	Rural Carr-EMA	
12	Sex		48	Rural Carr-Hours	
13	Ethnicity-Race		49	Rural Carr-Miles	
14	Disability	05	50	Job Sequence	
15	Leave Comp Date	09-12-1998	51	Occupation Code	2315-0063
16	Enter on Duty Date	09-12-1998	52	Position title	MAIL PROCESSING CLERK
17	Retirement Comp Date	09-12-1998	53	Labor Dist Code	1800
18	Serv Annivers Date	20 1998	54	Designation/Activity	11/0
19	TSP Eligibility		55	Position Type	1 - FULL TIME
20	TSP Service Comm Date	09-12-1998	56	Limit Hours	0
21	Prior CSRS Service		57	Allowance Code	
22	Frozen CSRS Time		58	Employment Type	
23	Leave Data Category	6 - HOURS/PP	SALARY INFORMATION		
24	Leave Data-Start	21 2013	59	Pay Rate Code	A
25	Leave Data-Type	1 - ADVANCE AL - EARN SL	60	Rate Schedule Code	
26	Credit Military Serv	0000	61	Grade/Step	07/ O
27	reserved for future use		62	Base Salary	53668.00
28	Retirement Plan	8 - FERS	63	Cola	0.00
29	Employee Status	RD - REINS COMP CURNT EMP	64	Cola Roll-In Ind	B - PAY SCHEDULE 2
30	Life Insurance	C0 - Basic Only	65	Next Step PPYR	
31	Special Benefits		66	Merit Anniv Date	
POSITION INFORMATION			67	Merit Lump Sum	0.00
32	Employ Office-Fin No	25-4912	68	Special Salary Code	A - SAVED GRADE
33	Employ Office-Name	KALAMAZOO P&DC	69	Protected RSC	
34	Employ Office-Address	MANAGER KALAMAZOO P&DC 3885 S 9TH ST	70	Protected Grade/Step	/
35	Duty Station-Fin No	25-4912	71	Expiration PPYR	
36	Duty Station-Name	KALAMAZOO P&DC	72	Protected RC Hours	
37	Appt Expiration Date		73	Protected RC Miles	
NATURE OF PERSONNEL ACTION			74	RC Guaranteed Salary	
77	Nature of Action	998	75	Annuity Amount	0.00
79	Description	CRAFT COLA INCREASE			
80	Code	81	Code	82	Code
83	Code	84	Code	85	Code
84	Remarks				

PERSON ID:02754318 PERS ASSGN:02754318

85	Authorization JO ANN FEINDT, VP	86	Processed Date 08-30-2008
	AREA OPERATIONS-GREAT LAKES	87	Personnel Office ID
		88	OPF Location

PS Form 50, January 2009 (Exception to Standard Form 50)

PMG Documents (L.Chui)
000228



01	Effective Date 11-21-2009	Notification of Personnel Action 		02	Social Security Number 376-90-4174
EMPLOYEE INFORMATION U. S. Postal Service					
03	Employee Name-Last	CHUI	38	Probation Expir Date	
04	Employee Name-First	LAI	39	FLSA Status	N
05	Employee Name-Middle	MING	40	Pay Location	312
06	Mailing Address-Street/Box/Apt	398 SPRINGBROOK DR.	41	Rural Carrier-Route	
			42	Rural Carr-L-Rte ID	
07	Mailing Address-City	OTSEGO	43	Rural Carr-Pay Type	
08	Mailing Address-State	MI	45	Rural Carr-FLSA	
09	Mailing Address-Zip	49078-9319	46	Rural Carr-Commit	
10	Date of Birth	06-10-1964	47	Rural Carr-EMA	
11	Veterans Preference	1	48	Rural Carr-Hours	
12	Sex		49	Rural Carr-Miles	
13	Ethnicity-Race		50	Job Sequence	
14	Disability	05	51	Occupation Code	2315-0063
15	Leave Comp Date	09-12-1998	52	Position title	MAIL PROCESSING CLERK
16	Enter on Duty Date	09-12-1998	53	Labor Dist Code	1800
17	Retirement Comp Date	09-12-1998	54	Designation/Activity	11/0
18	Serv Anniver	20 1998	55	Position Type	1 - FULL TIME
19	TSP Eligibility		56	Limit Hours	0
20	TSP Service Comp Date	09-12-1998	57	Allowance Code	
21	Prior CSRS Service		58	Employment Type	
22	Frozen CSRS Time		SALARY INFORMATION		
23	Leave Data Category	6 - HOURS/PP	59	Pay Rate Code	A
24	Leave Data-Step	21 2013	60	Rate Schedule Code	
25	Leave Data-Type	1 - ADVANCE AL - EARN SL	61	Grade/Step	07/ O
26	Credit Military Serv	0000	62	Base Salary	54257.00
27	reserved for future use		63	Cola	0.00
28	Retirement Plan	8 - FERS	64	Cola Roll-In Ind	B - PAY SCHEDULE 2
29	Employee Status	RD - REINS COMP CURNT EMP	65	Next Step PPYR	
30	Life Insurance	C0 - Basic Only	66	Merit Anniv Date	
31	Special Benefits		67	Merit Lump Sum	0.00
POSITION INFORMATION			68	Special Salary Code	A - SAVED GRADE
32	Employ Office-Fin No	25-4912	69	Protected RSC	
33	Employ Office-Name	KALAMAZOO P&DC	70	Protected Grade/Step	/
34	Employ Office-Address	MANAGER KALAMAZOO P&DC 3885 S 9TH ST	71	Expiration PPYR	
35	Duty Station-Fin No	25-4912	72	Protected RC Hours	
36	Duty Station-Name	KALAMAZOO P&DC	73	Protected RC Miles	
37	Appt Expiration Date		74	RC Guaranteed Salary	
			75	Annuity Amount	0.00
NATURE OF PERSONNEL ACTION					
77	Nature of Action	997	78	Authority	39-USC Sect 1001
79	Description	CONTRACTUAL INCREASE			
80	Code	81	Code	82	Code
83	Code				
84	Remarks				

PERSON ID:02754318 PERS ASSGN:02754318

85	Authorization JO ANN FEINDT, VP	86	Processed Date 11-20-2009
	AREA OPERATIONS-GREAT LAKES	87	Personnel Office ID
		88	OPF Location

PS Form 50, January 2009 (Exception to Standard Form 50)

PMG Documents (L.Chui)
000227



**USPS REHABILITATION
JOB OFFER ASSIGNMENT**

Handwritten:
Xerox
Full
Rif
3-3-04

Employee: Lai Ming Chui
OWCP Claim#: 092017809
SSN: 376-90-4174
DOI: 12-31-01
Job Title: Mail Processing Clerk LDC: 1800
Level/Step: 06 H
Tour of Duty: 2400 - 0850 JSIO: 8690218
N/S Days Off: Thursday/Friday
Geographical Location: Kalamazoo Processing & Distribution Center
Salary: \$39,253
Pay Location: 115

EFFECTIVE DATE: 02-21-04

Based upon medical evidence received by A. Ronald Rook, D.O., Board Certified, Orthopaedic Surgery, the USPS is officially offering you the following rehab assignment which lists a description of the duties assigned along with the physical requirements to perform the assigned tasks.

This job is offered to you in good faith and is tailored to meet your physical needs. You are hereby instructed to work within those medically defined restrictions. This job offer will remain open and available to you, however, you are required to submit medical evidence yearly.

DESCRIPTION OF DUTIES WITH PHYSICAL REQUIREMENTS

MODIFIED JOB ASSIGNMENT DESCRIPTION OF DUTIES:

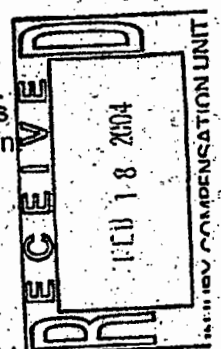
Processing union requests: Duties require sitting at a desk utilizing a computer typing in information to retrieve reports to file alleged grievances that the APWU has requested for further investigation. Reports will be sent via in-house mail.

Filing 3971's: Requires sitting on a chair and filing slips into file cabinet consisting of four (4) drawers.

Recording casual and PTF schedules: Requires sitting at a desk and utilizing a computer, filling in days that employees are required to work which will be given to you by supervisors. Schedule is done every two (2) weeks.

Preparing holiday schedules: Requires sitting at a desk and utilizing a computer with some typing. You will prepare request forms, pass to supervisors for distribution. Compile all data, type in results, print copies for

Lai Ming Chui



2/15/2004 12:50 AM

PMG Documents (L.Chui)
000262

Permanent Rehab Job Offer
Claim # 092017809
Page 2

Plant Manager, MDO's, Supervisors, APWU and place a copy on the employee bulletin board.

Quarterly Overtime Desired List: Requires sitting at a desk and utilizing a computer. You will gather names from employees, desired overtime requests, type into forms, and file for future use by supervisors.

Safety Service Talks: Requires sitting at a desk utilizing a computer, typing into the postal net and retrieving safety talks. You will then copy the talks and pass to supervisors.

Collecting Dock Surveys: Requires walking to the dock, collecting sheets from expeditors, and distributing to In-Plant Support.

Typing: Requires sitting at a desk and utilizing a computer.

Special Projects: You will assist MDO/supervisors on special projects requiring sitting at a desk and utilizing a computer by typing.

Conducting Postmark Checks: You will stand and observe trays for local originating mail by fingering through letters.

**LISTED BELOW ARE PHYSICAL RESTRICTIONS FROM WHICH THE
JOB WAS DEVELOPED**

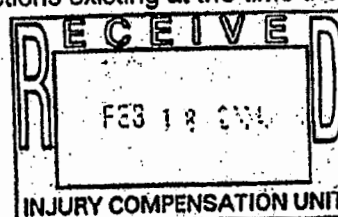
REACHING: 2 HOURS PER DAY

TWISTING: 2 HOURS PER DAY

LIFTING/CARRYING: 2 HOURS PER DAY, NO MORE THAN 15 LBS.
FREQUENTLY, 30 LBS. OCCASIONALLY

Future USPS operational needs may require a change in your tour of duty and/or assignment. However, *all* job assignments will be in *strict compliance* with any physical activity restrictions existing at the time the

Lai Ming Chui
Permanent Rehab Job Offer
Claim # 092017809



PMG Documents (L.Chui)
000263

FINAL
OFFER
CONC

Page 3

change is made to the rehab job assignment. Please indicate your decision by signing in the appropriate space below and return this job offer to the ICCO no later than February 13, 2004. In accordance with United States Code, Title 5, Section 8106(c), a partially disabled employee who either refuses to seek suitable work, or who refuses or neglects to work after suitable work is offered, is **not** entitled to compensation.

Manager, Human Resources or Designee

Date

☒ I accept the above job offer

Lai Ming Chui

2-15-04

Date

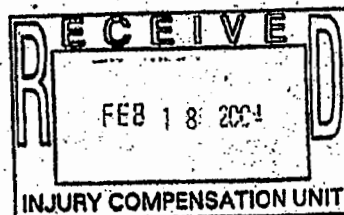
☐ I reject the above job offer

Date

Reason for refusal: _____

RETURN TO THE INJURY COMPENSATION CONTROL OFFICE
PO BOX 999444, GRAND RAPIDS, MI 49599-9444

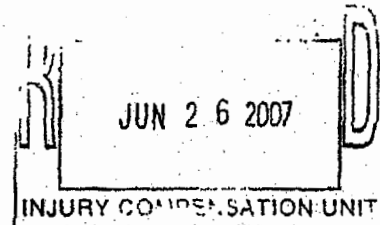
cc: OWCP
Official Personnel File
File



PMG Documents (L.Chui)
000264

[REDACTED]

Employee: Lai Ming Chui
OWCP Claim#: 092017809
SSN: 376-90-4174
DOI: 12-31-01
Job Title: Mail Processing Clerk
Level/Step: 06 M
Tour of Duty: 1900 - 0350
N/S Days Off: Sunday/Monday
Geographical Location: Kalamazoo Processing & Distribution Center
Salary: \$48,103
Pay Location: 115



EFFECTIVE DATE: 07/07/07

Based upon medical evidence received by A. Ronald Rook, D.O., Board Certified, Orthopaedic Surgery, the USPS is officially offering you the following rehab assignment which lists a description of the duties assigned along with the physical requirements to perform the assigned tasks.

This job is offered to you in good faith and is tailored to meet your physical needs. You are hereby instructed to work within those medically defined restrictions. This job offer will remain open and available to you, however, you are required to submit medical evidence yearly.

DESCRIPTION OF DUTIES WITH PHYSICAL REQUIREMENTS

MODIFIED JOB ASSIGNMENT DESCRIPTION OF DUTIES:

JUL 3 2007

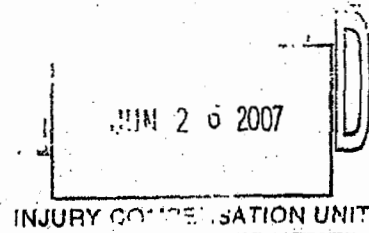
Processing union requests: Duties require sitting at a desk utilizing a computer typing in information to retrieve reports to file alleged grievances that the APWU has requested for further investigation. Reports will be sent via in-house mail.

Filing 3971's: Requires sitting on a chair and filing slips into file cabinet consisting of four (4) drawers.

Recording casual and PTF schedules: Requires sitting at a desk and utilizing a computer, filling in days that employees are required to work which will be given to you by supervisors. Schedule is done every two (2) weeks.

Preparing holiday schedules: Requires sitting at a desk and utilizing a computer with some typing. You will prepare request forms, pass to supervisors for distribution. Compile all data, type in results, print copies for

Lai Ming Chui
Permanent Rehab Job Offer
Claim # 092017809
Page 2



Plant Manager, MDO's, Supervisors, APWU and place a copy on the employee bulletin board.

Quarterly Overtime Desired List: Requires sitting at a desk and utilizing a computer. You will gather names from employees, desired overtime requests, type into forms, and file for future use by supervisors.

Safety Service Talks: Requires sitting at a desk utilizing a computer, typing into the postal net and retrieving safety talks. You will then copy the talks and pass to supervisors.

Collecting Dock Surveys: Requires walking to the dock, collecting sheets from expeditors, and distributing to In-Plant Support.

Typing: Requires sitting at a desk and utilizing a computer.

Special Projects: You will assist MDO/supervisors on special projects requiring sitting at a desk and utilizing a computer by typing.

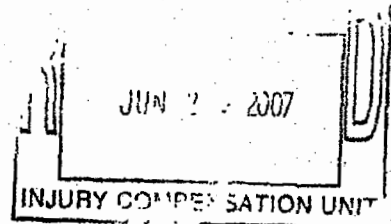
Conducting Postmark Checks: You will stand and observe trays for local originating mail by fingering through letters.

**LISTED BELOW ARE PHYSICAL RESTRICTIONS FROM WHICH THE
JOB WAS DEVELOPED**

REACHING:	2 HOURS PER DAY	JUL 3 2007
TWISTING:	2 HOURS PER DAY	
LIFTING/CARRYING:	2 HOURS PER DAY, NO MORE THAN 15 LBS. FREQUENTLY, 30 LBS. OCCASIONALLY	
CASING MAIL:	2 HOURS PER DAY	

Future USPS operational needs may require a change in your tour of duty and/or assignment. However, **all** job assignments will be in **strict compliance** with any physical activity restrictions existing at the time the

Lai Ming Chui
Permanent Rehab Job Offer
Claim # 092017809
Page 3



change is made to the rehab job assignment. Please indicate your decision by signing in the appropriate space below and return this job offer to the ICCO no later than **July 2, 2007**. In accordance with United States Code, Title 5, Section 8106(c), a partially disabled employee who either refuses to seek suitable work, or who refuses or neglects to work after suitable work is offered, is not entitled to compensation.

Cathy Lovett 6-25-07
Manager, Human Resources or Designee Date

☒ I accept the above job offer

Lai Ming Chui 6-22-07
Date

☐ I reject the above job offer

Date

Reason for refusal: _____

RETURN TO THE INJURY COMPENSATION CONTROL OFFICE
PO BOX 999444, GRAND RAPIDS, MI 49599-9444

cc: OWCP
Official Personnel File
File

PMG Documents (L.Chui)
000786

U.S. Department of Labor
Office of Workers' Compensation Programs

This form is provided for the purpose of obtaining a duty status report for the employee named below. This request does not constitute authorization for payment of medical expense by the Department of Labor, nor does it invalidate any previous authorization issued in this case. This request for information is authorized by law (5 USC 8101 et seq.) and is required to obtain or retain a benefit. Information collected will be handled and stored in compliance with the Freedom of Information Act, the Privacy Act of 1974 and the OMB Cir. A-108. Persons are not required to respond to this collection of information unless it displays a currently valid OMB control number.

OMB No 1240-0046
Expires 09-30-2011

OWCP File Number
(if known)

090403432

SIDE A - Supervisor: Complete this side and refer to physician				SIDE B - Physician: Complete this side			
1. Employee's Name (Last, first, middle) SIMMONS JOSEPH ANTHONY				8. Does the History of Injury Given to You by the Employee Correspond to that Shown in Item 5? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If not describe)			
2. Date of Injury (Month, day, yr.) 5 12 1995		3. Social Security No. [REDACTED]		9. Description of Clinical Findings Right Arm Pain			
4. Occupation GENERAL CLERK				10. Diagnosis Due to Injury Cervical Radiculopathy			
5. Describe How the Injury Occurred and State Parts of the Body Affected LIFTING BUCKET OF WATER 1996				11. Other Disabling Conditions			
6. The Employee Works 8 Hours Per Day 40 Days Per Week				12. Employee Advised to Resume Work <input type="checkbox"/> Yes Date Advised <input checked="" type="checkbox"/> No			
7. Specify the Usual Work Requirements of the Employee Check Whether Employee Performs These Tasks or is Exposed Continuously or Intermittently, and Give Number of Hours				13. Employee Able to Perform Regular Work Described on Side A? <input checked="" type="checkbox"/> Yes, If so <input type="checkbox"/> Full-time or <input type="checkbox"/> Part-time Hrs Per Day <input type="checkbox"/> No, If not, complete below			
Activity		Continuous #lbs.	Intermittent #lbs.	Continuous #lbs.		Intermittent #lbs.	
a. Lifting/Carrying State Max Wt			0				
b. Sitting		<input type="checkbox"/>	<input type="checkbox"/>				
c. Standing		<input type="checkbox"/>	1				
d. Walking		<input type="checkbox"/>	1				
e. Climbing		<input type="checkbox"/>	0				
f. Kneeling		<input type="checkbox"/>	0				
g. Bending/Stooping		<input type="checkbox"/>	0				
h. Twisting		<input type="checkbox"/>	0				
i. Pulling/Pushing		<input type="checkbox"/>	0				
j. Simple Grasping		<input type="checkbox"/>	1				
k. Fine Manipulation (includes keyboarding)		<input type="checkbox"/>	As Tolerated				
l. Reaching above Shoulder		<input type="checkbox"/>	0				
m. Driving a Vehicle (Specify)		<input type="checkbox"/>	4				
n. Operating Machinery (Specify)		<input type="checkbox"/>	0				
o. Temp. Extremes		<input type="checkbox"/>	0				
p. High Humidity		<input type="checkbox"/>	3				
q. Chemicals, Solvents, etc (Identify)		<input type="checkbox"/>	3				
r. Fumes/Dust (Identify)		<input type="checkbox"/>	4				
s. Noise (Give dBA)		<input type="checkbox"/>	4				
t. Other (Describe)				14. Are Interpersonal Relations Affected Because of a Neuropsychiatric Condition? (e.g. Ability to Give or Take Supervision, Meet Deadlines etc.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Describe)			
				15. Date of Examination 8-6-96		16. Date of Next Appointment	
				17. Specimen		18. Tax Identification Number	
				19. Physician's Signature [Signature]		20. Date 8-6-96	

Duty Status Report

U.S. Department of Labor



This form is provided for the use of employers and employees to report on the duties performed by an employee on a particular day. It is to be filled out by the employer and the employee, and it is to be submitted to the Department of Labor. The form is to be filled out for each day on which the employee is required to work. The form is to be filled out for each day on which the employee is required to work. The form is to be filled out for each day on which the employee is required to work.

Employer's Name
Employee's Name
Employer's Address
Employee's Address
Date
Time

1. Employee's Name (Last, First, Middle Initial)
2. Date of Birth (Month, Day, Year)
3. Occupation
4. Describe how the duty is performed (e.g., "The duty is performed by the employee...")
5. The Employee Works (a) Hours Per Day (b) Days Per Week
6. Specify the Usual Work Requirements of the Employee (Check whether Employee Performs These Tasks as a Regular, Continuous, or Intermittent, and Frequency of Tasks)

Activity	Continuous	Intermittent	Frequency	Hours Per Day
a. Lifting/Carrying (State Size of)	Yes	Yes	15	15 Per Day
b. Sitting	Yes	Yes	15	15 Per Day
c. Standing	Yes	Yes	15	15 Per Day
d. Walking	Yes	Yes	15	15 Per Day
e. Climbing	Yes	Yes	15	15 Per Day
f. Reaching	Yes	Yes	15	15 Per Day
g. Pushing/Pulling	Yes	Yes	15	15 Per Day
h. Twisting	Yes	Yes	15	15 Per Day
i. Pulling/Pushing	Yes	Yes	15	15 Per Day
j. Simple Grasping	Yes	Yes	15	15 Per Day
k. Fine Manipulation (includes tool use)	Yes	Yes	15	15 Per Day
l. Reaching above Shoulder	Yes	Yes	15	15 Per Day
m. Driving a Vehicle (Specify)	Yes	Yes	15	15 Per Day
n. Operating Machinery (Specify)	Yes	Yes	15	15 Per Day
o. Temp. Exposure	Yes	Yes	15	15 Per Day
p. High Speed	Yes	Yes	15	15 Per Day
q. Chemicals, Solvents, etc. (Specify)	Yes	Yes	15	15 Per Day
r. Exposed to Noise	Yes	Yes	15	15 Per Day
s. Other (Specify)	Yes	Yes	15	15 Per Day

EXHIBIT
2-E

Duty Status Report

U.S. Department of Labor Employment Standards Administration Office of Workers' Compensation Programs



This form is provided for the purpose of obtaining a duty status report for the employee named below. This request does not constitute authorization for payment of medical expense by the Department of Labor, nor does it invalidate any previous authorization issued in this case. This request for information is authorized by law (5 USC 8101 et seq.) and is required to obtain or retain a benefit. Information collected will be handled and stored in compliance with the Freedom of Information Act, the Privacy Act of 1974 and the OMB Cir. A-108. Persons are not required to respond to this collection of information unless it displays a currently valid OMB control number.

OMB No. 1215-0103
Expires: 09-30-2011

OWCP File Number
(If known)

092031338

SIDE A - Supervisor: Complete this side and refer to physician

1. Employee's Name (Last, first, middle)
Gurnee Shirley

2. Date of Injury (Month, day, yr.) 02/18/2003

3. Social Security No. [REDACTED]

4. Occupation Mail Processing Clerk

5. Describe How the Injury Occurred and State Parts of the Body Affected

SIDE B - Physician: Complete this side

8. Does the History of Injury Given to You by the Employee Correspond to that Shown in Item 5? ☒ Yes ☐ No (If not, describe)

9. Description of Clinical Findings Shoulder Pain

10. Diagnosis Due to Injury Yes 11. Other Disabling Conditions

12. Employee Advised to Resume Work?

☒ Yes, Date Advised ☐ No

13. Employee Able to Perform Regular Work Described on Side A?

☐ Yes, If so ☐ Full-Time or ☐ Part-Time _____ Hrs Per Day

☒ No, If not, complete below:

Activity	Continuous	Intermittent		Continuous	Intermittent	
a. Lifting/Carrying: State Max Wt.	#lbs.	#lbs.	8 Hrs Per Day	#lbs.	10 lbs	Hrs Per Day
b. Sitting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0 Hrs Per Day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
c. Standing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8 Hrs Per Day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
d. Walking	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8 Hrs Per Day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
e. Climbing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4 Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
f. Kneeling	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4 Hrs Per Day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
g. Bending/Stooping	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4 Hrs Per Day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
h. Twisting	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4 Hrs Per Day	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4 Hrs Per Day
i. Pulling/Pushing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4 Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
j. Simple Grasping	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6 Hrs Per Day	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6 Hrs Per Day
k. Fine Manipulation (includes keyboarding)	<input type="checkbox"/>	<input type="checkbox"/>	0 Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	NA Hrs Per Day
l. Reaching above Shoulder	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4 Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
m. Driving a Vehicle (Specify)	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
n. Operating Machinery (Specify)	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
o. Temp. Extremes	<input type="checkbox"/>	<input type="checkbox"/>	range in degrees F	<input type="checkbox"/>	<input type="checkbox"/>	range in degrees F
p. High Humidity	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
q. Chemicals, Solvents, etc. (Identify)	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
r. Fumes/Dust (Identify)	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	Hrs Per Day
s. Noise (Give dBA)	<input type="checkbox"/>	<input type="checkbox"/>	dBA Hrs Per Day	<input type="checkbox"/>	<input type="checkbox"/>	dBA Hrs Per Day

t. Other (Describe)

14. Are Interpersonal Relations Affected Because of a Neuropsychiatric Condition? (e.g. Ability to Give or Take Supervision, Meet Deadlines, etc.) ☐ Yes ☒ No (Describe) NA

15. Date of Examination 9/21/09

16. Date of Next Appointment 1-30-10

17. Specialty Orthopedic Surgery

18. Tax Identification Number 383148262

19. Physician's Signature

20. Date 9/21/09

LIGHT DUTY STATUS REPORT

Part 1 - Employee

Name: Anthony Liccio Date of Injury 7/9/07 SSN: [REDACTED]
 Craft: manual clerk Pay Location 112 Tour 1 L7
 Physician/Medical Facility Name: Pro Med
 Address: 7901 Angling Rd Phone 324 8510

Part 2 - Physician

Is Employee Fit for Light Duty:

Yes ☒ NO ☐
 If yes, please check duty status below

Limitations	Yes	No
Pulling	<input type="checkbox"/>	<u>no pulling</u>
Pushing	<input type="checkbox"/>	<u>no pushing</u>
Carrying	<u>no more</u>	<u>than 5 lbs</u>
Reaching/Working Above Shoulders	<input type="checkbox"/>	<u>no reaching above</u>
Operating a Motor Vehicle	<input type="checkbox"/>	<u>shoulder</u>
Crane, Tractor, Etc.	<u>OK</u>	<input type="checkbox"/>
Lifting	<input type="checkbox"/>	<input type="checkbox"/>

Lifting to 5 pounds

Other Restrictions - Please Specify
limited duty

Patient still needs claim number from
DWCP injury 7/9/07 left groin

Please list number of hrs per 8 hour workday employee may do the following:

Standing	<u>1</u> HRS	Stooping	<u>0</u> HRS
Walking	<u>1</u> HRS	Kneeling	<u>0</u> HRS
Sitting	<u>4</u> HRS	Repeated Bending	<u>0</u> HRS
Climbing	<u>0</u> HRS	Reaching above Shoulder	<u>0</u> HRS

Fit for Light Duty Dates

From now To 4/14/08

Fit for Full Duty Date:

Physician Signature [Signature]

Date 3/14/08

This request will be review every 30 days

Note: Fit for Light Duty date may contain the next doctor's appointment date providing it does not exceed 30 days.

Still waiting for my claim number for left
groin injury from D.W.C.P.



F

TEMPORARY LIGHT DUTY ASSIGNMENT

(APPROVAL)

Name:

Anthony Riccio

SSN:

[REDACTED]

Position Title:

Manual Clerk

Work Location:

Kalamazoo P-DC

Your request for Light Duty is approved. Your Light Duty Assignment is:

Unit:

Manual Clerk

Time:

2300 0750

RDO:

SA-SU

Duration:

2-22-08 to 3-28-08

Cathy E. Lovett

Cathy E. Lovett
Plant Manager

3-5-08

Date

Sam Raymer
Union Representative

3-5-08

Date

**USPS REHABILITATION
JOB OFFER**

Employee: Pamela Stenger
OWCP Claim: 092059515
SSN: [REDACTED]
DOI: 03-23-05
Job Title: Mail Processing Clerk
Level/Step: 05 O
Tour of Duty: 0350 to 1200
N/S Days Off: Saturday/Sunday
Geographical Location: Kalamazoo P & DC
Salary: [REDACTED]
Level 5, Step 0 [REDACTED]

SECTION 1:

EFFECTIVE DATE: 01-03-2009

Based upon medical evidence received by, Dr. Edward J. Westerbeke, the USPS is officially offering you the following rehab assignment which lists a description of the duties assigned along with the physical requirements to perform the assigned tasks.

This job is offered to you in good faith and is tailored to meet your physical needs. You are hereby instructed to work within those medically defined restrictions. This job offer will remain open and available to you; however, you are required to submit medical evidence yearly.

DESCRIPTION OF DUTIES WITH PHYSICAL REQUIREMENTS**MODIFIED JOB ASSIGNMENT DESCRIPTION OF DUTIES:**

Follow-up phone contact with mailers for packages that do not meet aviation security guidelines, contact with mailers for packages that are leaking (for retrieval or disposal): Duties require calling mailers and retrieving packages weighing no more than 10 lbs. using a u-cart to transport them as necessary to the building entrance for customer pick-up.

Note taking for various meetings: Require sitting with pen and paper and writing; may include using a computer to type up the information, printing copies as necessary and distributing.

Filing: Requires filing paperwork into file cabinets consisting of four (4) drawers or less.

Typing: Requires sitting at a desk and utilizing a computer or manual typewriter.

Copying: Requires standing at a copier and feeding paperwork into the copy machine.

Processing union requests: Duties require sitting at a desk utilizing a computer and typing in information to retrieve reports to file alleged grievances that the unions have requested for further investigation.

Responding to the entrance intercom system inquiries: Duties include sitting in a chair and answering the buzzer as well as, contacting the necessary person to assist them with their needs.

Appointment scheduling for pre-hire applicants: Duties include sitting in a chair and using the phone to call potential candidates for postal positions and scheduling them for any necessary appointments.



12/29/2008 8:29:39 AM

00187

Exhibit 14
PMG Documents (L. Chui)
000190

2

Answering the Postal Service phones at the plant: Duties include sitting in a chair and using the phone to answer telephone calls.

Driving express mail and any other postal delivery duties: Duties include sitting in a postal vehicle, driving to delivery destination, walking to delivery destination from postal vehicle, walking back to the postal vehicle, and driving postal vehicle to next delivery destination (if any), repeating the above, finally returning in postal vehicle to the Plant.

LISTED BELOW ARE PHYSICAL RESTRICTIONS FROM WHICH THE JOB WAS DEVELOPED

STANDING: N/A

SITTING: N/A

WALKING: N/A

LIFTING/CARRYING: NO LIFTING MORE THAN 10 LBS

DRIVING: N/A

PUSHING/PULLING/REACHING: NO AT-OR-ABOVE SHOULDER WORK WITH THE LEFT ARM, NO AWAY-FROM-THE BODY REPETITIVE, CONTINUOUS WORK

OVERHEAD REACHING: NO OVERHEAD REACHING

BENDING: N/A

STOOPING: N/A

TWISTING: N/A

GRIPPING: N/A

FINE MANIPULATION: N/A

SECTION 2:

Future USPS operational needs may require a change in your tour of duty and/or assignment. However, *all* job assignments will be in *strict compliance* with any physical activity restrictions existing at the time the change is made to the rehab job assignment. Please indicate your decision by signing in the appropriate space below and return this job offer to the Health & Resource Management Unit, P.O. Box 999444, Grand Rapids, MI 49599-9444 no later than 12/30/2008.

In accordance with United States Code, Title 5, Section 8106(c), a partially disabled employee who either refuses to seek suitable work, or who refuses or neglects to work after suitable work is offered, is not entitled to compensation.

Cathy Lovett
Cathy Lovett, Plant Manager
Kalamazoo Processing & Distribution Center

12/29/08
Date

☒ I accept the above job offer Pamela M. [Signature] 12/30/08
Date

☐ I reject the above job offer _____
Date

Reason for refusal: _____

cc: OWCP
Official Personnel File
File

00188

Exhibit 14
Page 2 of 2
PMG Documents (L. Grant)
000191